

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DIEGO FRANCO, MUSTAPHA BABACI, and  
JUAN JUAREZ, on behalf of themselves and others  
similarly situated,

Plaintiffs,

v.

JUBILEE FIRST AVENUE CORPORATION,  
ILDA ARAUJO and ERIC MACAIRE,

Defendants.

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14 Civ.7729 (SN)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law and annexed materials, Plaintiffs shall move the Court at such date and time as counsel may be heard to grant Plaintiffs' motion for partial summary judgment.

Dated: New York, New York  
January 4, 2016

/s/ Josef Nussbaum  
D. Maimon Kirschenbaum  
Josef Nussbaum  
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